

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO. 1:24-cv-22751-BLOOM/Elfenbein

DAS NOBEL, EDUARDO MARTINEZ, DANIEL
GRANDE, WILLIAM POU, and DAVID ZIEMEKE
on behalf of themselves and on behalf of all other
similarly situated,

Plaintiffs,

vs.

SOUTH FLORIDA STADIUM LLC d/b/a HARD
ROCK STADIUM, MIAMI DOLPHINS, LTD;
COUNTY LINE SOUTH PROPERTIES, LLC;
DOLPHIN CENTER PROPERTIES, LLC;
CONFEDERACIÓN SUDAMERICANA DE
FÚTBOL d/b/a CONMEBOL, CONFEDERATION
OF NORTH, CENTRAL AMERICA AND
CARIBBEAN ASSOCIATION FOOTBALL d/b/a
CONCACAF, and BEST CROWD
MANAGEMENT, INC.,

Defendants.

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JOINT STATUS REPORT

Plaintiffs Das Nobel, Eduardo Martinez, Daniel Grande, William Pou, and David Ziemek (collectively, “Plaintiffs”) and Defendants South Florida Stadium LLC (“SFS”), Miami Dolphins, Ltd., County Line South Properties, LLC, Dolphin Center Properties, LLC, Confederación Sudamericana de Fútbol, Confederation of North, Central America and Caribbean Association Football (“CONCACAF”), and BEST Crowd Management, Inc. (collectively, “Defendants” and with Plaintiffs, the “Parties”), respectfully submit the following joint status report:

On January 16, 2025, the Court granted the Parties’ joint motion for a stay of all deadlines while the Parties participated in a mediation, and the Court directed the Parties to submit a status

report following the initial mediation scheduled for March 28, 2025. See Order Granting Joint Motion for a Stay of All Deadlines (Nobel Dkt. 153).

On March 28, 2025, the Parties participated in an in-person mediation before Terrence M. White of Upchurch Watson White and Max Mediation Group. The initial mediation was productive, but negotiations were not concluded during the March 28, 2025 session and were continued at the joint request of the Parties. A second mediation was then scheduled for May 13, 2025, and as a result, the Court granted the request of the Parties to extend the stay, directing the Parties to submit a joint status report by May 20, 2025. See Order Extending Stay of Proceedings (Nobel Dkt. 158).

On May 13, 2025, the Parties participated in a second mediation session before Mr. White.¹ On May 20, 2025, the Parties submitted a joint status report. See Joint Status Report (Nobel Dkt. 159). In the status report, the Parties informed the Court that the May 13, 2025 mediation session was productive, the remaining issues were addressed, and the Parties were in the process of preparing and circulating a draft term sheet. See Joint Status Report (Nobel Dkt. 159) at 2. The status report requested the stay be extended for an additional thirty (30) days while the Parties worked to finalize a term sheet. See id. On May 21, 2025, the Court granted the request for an extension of the stay and ordered Plaintiffs to submit a status report by June 20, 2025. See Order Granting Joint Motion for Extension of Stay (Nobel Dkt. 160).

On June 20, 2025, the Parties submitted a joint status report updating the Court on the progress made on finalizing a term sheet and requesting the stay be extended for an additional ten (10) days while the Parties worked to finalize and sign a term sheet. See Joint Status Report (Nobel

¹ The May 13, 2025 mediation took place by Zoom at the request of counsel for Kattia Garn, the Named Plaintiff in Garn v. South Florida Stadium, et al., Case No. 1:24-cv-25087 (S.D. Fla.) ("Garn"), as one of Ms. Garn's counsel lives in California.

Dkt. 161). On June 24, 2025, the Court granted the extension and directed Plaintiffs to submit a status report by July 3, 2025. See Order Granting Joint Motion for Extension of Stay (Nobel Dkt. 162).

On July 3, 2025, the Parties submitted a joint status report informing the Court that they had in fact finalized a term sheet and requested the stay be extended for an additional sixty (60) days while the Parties worked to prepare and execute a definitive, written settlement agreement. See Joint Status Report (Nobel Dkt 163). On July 7, 2025, the Court granted the extension and directed Plaintiffs to submit a status report by September 1, 2025. See Order Granting Joint Motion for Extension of Stay (Nobel Dkt. 164).

Since filing the July 3, 2025 status report, the Parties have made significant progress on a written settlement agreement.² In addition, at the direction of the U.S. Court of Appeals for the Eleventh Circuit, on July 23, 2025, SFS and CONCACAF participated in a mediation session with Plaintiff's counsel in Garn.³ The mediation took place before Matthew Hodes, a mediator for the Eleventh Circuit. Although no settlement was reached at the July 23, 2025 mediation session, Plaintiff's counsel in Garn subsequently had productive conversations with Plaintiffs' counsel in Nobel as well as SFS's counsel about potentially joining the settlement in this case and dismissing the Garn action. If agreement can be reached on the dismissal of Garn, it will eliminate the need for the Eleventh Circuit and the District Court in Garn to spend any more time on that case.

² The term sheet and definitive written settlement agreement are both subject to the consent and participation of insurance carriers for a number of the Defendants, and efforts have been and are simultaneously underway to secure that consent and cooperation.

³ The Garn case is currently before the Eleventh Circuit on the appeal of SFS and Confederation of North, Central America and Caribbean Association Football of the denial of their motion to compel arbitration by the District Court in Garn.

Although substantial progress has been made on a definitive, written settlement agreement in this case, in light of the number of parties involved, the above-referenced discussions with Plaintiff's counsel in Garn, and the need to obtain consent and participation of insurance carriers for a number of Defendants, the Parties anticipate needing an additional forty-five (45) days to finalize a settlement agreement. At this time, however, the Parties have no reason to believe why any further extensions will be necessary before a motion for preliminary approval can be filed with this Court for a proposed class settlement of this matter.

WHEREFORE, the undersigned respectfully request that the Court extend the current stay entered in this action for an additional forty-five (45) days in order to allow the Parties to finalize and execute a settlement agreement for the contemplated class settlement.

Date: September 1, 2025

Respectfully submitted,

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